

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

-vs-

D-1 MICHAEL MITCHELL,  
Defendant.

Hon. Terrence G. Berg

No. 18-CR-20162

\_\_\_\_\_/ Sentencing Date: March 14, 2019

**GOVERNMENT'S SENTENCING POSITION  
AS TO DEFENDANT MICHAEL MITCHELL**

The United States of America submits the following in connection with the sentencing of defendant Michael Mitchell on March 14, 2019.

The government concurs with the statement of facts and sentencing calculations continued in the Presentence Report (PSR). With an offense level 8 and a criminal history category I, the defendant's guideline range is 0-6. Pursuant to its plea agreement with the defendant, the government makes a non-binding recommendation that the defendant be sentenced to a term of probation.

This government's recommendation is based on the fact that the defendant lacks any criminal history, he promptly confessed to law enforcement, and the

approximately \$5,000 worth of law equipment that he stole from Plymouth Township has been recovered by the Township.

Respectfully submitted,

MATTHEW SCHNEIDER  
United States Attorney

*s/R. Michael Bullotta*  
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R. MICHAEL BULLOTTA  
Assistant United States Attorney  
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Detroit, MI 48226  
313-226-9507  
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Date: March 7, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2019, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to:

Mark Kriger  
Attorney for Michael Mitchell

s/R. Michael Bullotta  
R. MICHAEL BULLOTTA  
Assistant United States Attorney

Date: March 7, 2019